



July 27, 2017

VIA CM/ECF & HAND DELIVERY

The Honorable Gregory M. Sleet
The United States District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801

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RE: Koninklijke Philips N.V. v. Visual Land, Inc., C.A. No. 15-1127-GMS

Dear Judge Sleet,

In anticipation of the teleconference scheduled for Monday, July 31 at 2 PM EDT, in the above-referenced matter, the parties jointly submit this letter agenda, pursuant to paragraph 5(a) of the Scheduling Order (D.I. 48) to apprise the Court of the following disputed issues:

Plaintiffs' Issues:

- Whether Visual Land should be required to supplement its response to Philips' Interrogatory No. 2 seeking sales information for the Accused Products by August 11, 2017 or be subject to entry of default by the Clerk of Court.
- Whether Visual Land should be required to supplement its response to Philips' Interrogatory Nos. 1 and 5 seeking certain information for the Accused Products (e.g., first and last sales dates, operating system version, etc.) by August 18, 2017 or be subject to entry of default by the Clerk of Court.
- Whether Visual Land should be required to supplement its response to Philips' Interrogatory No. 4 seeking non-infringement contentions by August 25, 2017 or be subject to entry of default by the Clerk of Court.
- Whether Visual Land should be required to substantially complete its document production by August 25, 2017 or be subject to entry of default by the Clerk of Court.

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- Whether Visual Land should be required to abide by all prospective case deadlines in the Order Amending Rule 16 Scheduling Order (D.I. 193, as ordered July 14, 2017).
- Whether Visual Land should be required to retain replacement counsel in thirty days' time, should Young Conaway Stargatt & Taylor, LLP be allowed to withdraw or otherwise come to no longer represent Visual Land, or be subject to entry of default by the Clerk of Court.

Defendant's Issues:

- Whether Visual Land should be afforded additional time to complete its supplementation of discovery responses and document production, under the schedule it proposed in the July 7, 2017 Joint Status Report (D.I. 204 at 4-6).
- Whether any other deadlines set forth in the Order Amending Rule 16 Scheduling Order (D.I. 193, as ordered July 14, 2017) should be amended to account for Visual Land's proposed schedule to catch up on discovery.

Counsel are available at the Court's convenience should Your Honor have any questions in advance of the July 31, 2017 teleconference.

Respectfully submitted,

/s/ Daniel M. Silver

Daniel M. Silver (#4758)

cc: Counsel of record (via CM/ECF & electronic mail)